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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10

11 SUSAN KIELY KRAUSS, an individual

12 Plaintiff,

13 vs.

14 VOLKSWAGEN OF AMERICA, INC., a
15 Delaware Corporation,

16 Defendant.
17

CASE NO. C04-02989 PJH

**STIPULATION AND [PROPOSED] ORDER
TO CONTINUE CASE MANAGEMENT
CONFERENCE**

1 Plaintiff Susan Kiely Krauss ("Plaintiff") and defendant Volkswagen of America,
2 Inc. ("Defendant"), through their respective counsel, hereby stipulate to continue the Case
3 Management Conference, currently scheduled for February 23, 2006, as follows:
4

5 **STIPULATION**

6 IT IS HEREBY STIPULATED by, between and among Plaintiff, on the one hand, and the
7 Defendant, on the other hand, through their respective attorneys, as follows:

8 WHEREAS a Case Management Conference is currently calendared for February 23,
9 2006;

10 WHEREAS the Parties reached a written settlement that required defendant VWoA to
11 provide settlement checks to plaintiff between January 1, 2006 and January 15, 2006, and that the
12 case management conference scheduled for February 2 was continued to February 23 to allow
13 VWoA additional time to correct clerical errors in the settlement checks that were provided VWoA
14 and returned by plaintiff Susan Krauss;

15 WHEREAS VWofA needs further additional time to process the settlement checks,
16 which are expected to be provided to plaintiff's counsel before the end of February;

17 WHEREAS postponement of the aforementioned conference will allow the Parties time to
18 fully perform their respective obligations under the settlement agreement and then file a Stipulation
19 for Dismissal of this action;

20 WHEREAS good cause exists for the requested order because allowing time for the
21 parties to complete the settlement and dismiss this action will save the parties time, effort, and
22 expense, and will further conserve judicial resources;

23 NOW THEREFORE it is stipulated by and between the Parties, through their
24 respective counsel of record, as follows:

25 The Case Management Conference shall be continued from February 23, 2006, to March 23,
26 2006, or as soon thereafter as is convenient for the Court.
27
28

1 IT IS SO STIPULATED.

2
3 DATED: February 17, 2006

JEFFER, MANGELS, BUTLER & MARMARO LLP
R. SCOTT BRINK
BARBRA A ARNOLD

6 BY: _____/S/
BARBRA ARNOLD
7 ATTORNEYS FOR DEFENDANT VOLKSWAGEN
8 OF AMERICA, INC.

9 DATED: February 17, 2006

O'KEEFE & O'KEEFE LLP
GARET D. O'KEEFE

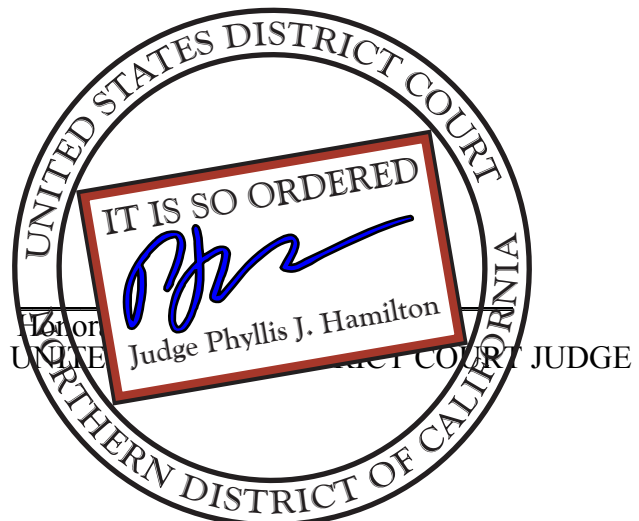
11 BY: _____/S/
12 GARET D. O'KEEFE
13 ATTORNEYS FOR PLAINTIFF SUSAN KIELY
14 KRAUSS

15
16 **[PROPOSED] ORDER**

17 Good cause having been shown by the foregoing Stipulation of the parties,
18 IT IS HEREBY ORDERED that the Case Management Conference is continued from February 23,
19 2006, to March 23, 2006.

21
22 IT IS SO ORDERED.

23
24 Dated: 2/21/06



ATTESTATION

I hereby attest that the content of this document is acceptable to all persons required to sign the document, and that I have on file all required holograph signatures for any signatures indicated by a "conformed" signature within this efiled document.

/s/
Garet D. O'Keefe